



Minnesota Pollution Control Agency

520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 SWPPP Application for Reauthorization

for the NPDES/SDS General Small Municipal Separate Storm Sewer System (MS4) Permit MNR040000 reissued with an effective date of August 1, 2013
Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at <http://www.pca.state.mn.us/ms4>.

Submittal: This MS4 SWPPP Application for Reauthorization form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: City of Eden Prairie *County: Hennepin
(city, county, municipality, government agency or other entity)
*Mailing address: 8080 Mitchell Road
*City: Eden Prairie *State: MN *Zip code: 55344
*Phone (including area code): 952-949-8410 *E-mail: rgetschow@edenprairie.org

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Stovring *First name: Leslie
(department head, MS4 coordinator, consultant, etc.)
*Title: Environmental Coordinator
*Mailing address: Engineering Dept., 8080 Mitchell Road
*City: Eden Prairie *State: MN *Zip code: 55344
*Phone (including area code): 952-949-8327 *E-mail: lstovring@edenprairie.org

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: Stovring First name: Leslie
(department head, MS4 coordinator, consultant, etc.)
Title: Environmental Coordinator
Mailing address: Engineering Dept., 8080 Mitchell Road
City: Eden Prairie State: MN Zip code: 55344
Phone (including area code): 952-949-8327 E-mail: lstovring@edenprairie.org

Verification

- I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this MS4 SWPPP Application for Reauthorization form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). Yes
- I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. Yes

Certification (All fields are required)

- Yes - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Rick Getschow
(This document has been electronically signed)

Title: City Manager Date (mm/dd/yyyy): December 27, 2013

Mailing address: 8080 Mitchell Road

City: Eden Prairie State: MN Zip code: 55344

Phone (including area code): 952-949-8300 E-mail: rgetschow@edenprairie.org

Note: *The application will not be processed without certification.*

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

- A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved

- B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships*.

Hennepin County Environmental Services - Wetland Health Evaluation Program (WHEP) - Participate annually as volunteers and program funding are available.

Metropolitan Council Environmental Services - Citizen Assisted Monitoring Program (CAMP) - Participate annually as volunteers and program funding are available

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

- A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? Yes No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- Ordinance Contract language
 Policy/Standards Permits
 Rules
 Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City Code Section 5.75

Direct link:

http://www.edenprairie.org/citycode

Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg*.

2. If **no**:

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

Construction site stormwater runoff control

- A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? Yes No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- Ordinance Contract language
 Policy/Standards Permits
 Rules
 Other, explain: Development Agreements, Specifications

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City Code Chapter 11.55, Subdivisions 5, 6, 8 and 9

Direct link:

<http://www.edenprairie.org/citycode>

- Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg.*

- B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? Yes No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Engineering staff will work with Planning and Building Department Staff to update the City Code Section 11.55 to meet the requirements in the permit within 12 months of the date permit coverage is extended.

- C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

- | | | |
|--|---|-----------------------------|
| 1. Best Management Practices (BMPs) to minimize erosion. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. BMPs to minimize the discharge of sediment and other pollutants. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. BMPs for dewatering activities. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Site inspections and records of rainfall events | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5. BMP maintenance | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 6. Management of solid and hazardous wastes on each project site. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 8. Criteria for the use of temporary sediment basins. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Post-construction stormwater management

- A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities? Yes No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- Ordinance Contract language
 Policy/Standards Permits
 Rules
 Other, explain: Development Agreements

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City Code Chapter 11.55 Subdivisions 8 and 9

Direct link:

<http://www.edenprairie.org/citycode>

Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg*.

- B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. Yes No
2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):
 - a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: Yes No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of Total Suspended Solids (TSS).
 - 3) Stormwater discharges of Total Phosphorus (TP).
 - b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: Yes No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of TSS.
 - 3) Stormwater discharges of TP.
3. **Stormwater management limitations and exceptions:**
 - a. Limitations Yes No
 - 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: Yes No
 - a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
 - 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: Yes No
 - a) With predominately Hydrologic Soil Group D (clay) soils.
 - b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - d) Where soil infiltration rates are more than 8.3 inches per hour.
 - 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. Yes No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:
- a. Mitigation project areas are selected in the following order of preference: Yes No
 - 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
 - b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. Yes No
 - c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. Yes No
 - d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. Yes No
 - e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. Yes No
 - f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). Yes No
5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. Yes No
 - b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. Yes No
 - c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. Yes No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

Engineering Department staff will evaluate the permit conditions in relation to current City Code requirements and update as needed within 12 months from when permit coverage is extended.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

- A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? Yes No
- 1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
 - 2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

Engineering Department staff will work with Building, Planning, Utility, Street and Fire Department staff to develop ERPs within 12 months from when permit coverage is extended.

B. Describe your ERPs:

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

We use Geographic Informational System technology to map all identified components of our storm sewer system. Environmental interns and technicians supplement engineering staff to inspect stormwater wetlands, constructed ponds and infiltration basins and update the Storm Sewer System Map as needed. The City also has an Engineering Technician who updates the map on-site using a handheld GPS unit. The Storm Sewer System map includes inlet (including outfalls) and outlet pipes that are 12 inches in diameter and larger. The City also hires consultants to conduct inventories and assessments on an annual basis, this work is done by lake or creek subwatershed and is expected to take 11 years to complete a city-wide inventory. Once the inventory work is completed the City will evaluate the current map and determine if any adjustments are required.

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. Yes No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. Yes No
3. Structural stormwater BMPs that are part of the permittee's small MS4. Yes No
4. All receiving waters. Yes No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

All known components are mapped and will be updated as the inventories are completed.

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172, Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. Yes No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. Yes No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. Yes No
2. A geographic coordinate. Yes No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. Yes No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: <http://www.pca.state.mn.us/ms4>, according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*. Yes No

If you answered **no**, the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

The City of Eden Prairie aims to educate residents via a variety of methods. The City uses various media outlets such as local news articles, City newsletters (Life in the Prairie and Living Green), Facebook, and the City of Eden Prairie Living Green web site to educate citizens on the basics of our stormwater system, provide updates on current actions the city is taking to monitor or improve stormwater systems, and inform residents about opportunities to improve local water bodies through workshops, volunteer opportunities, or rebates. The City has developed an Environmental Learning Center, located within of the Water Treatment Plant, to educate students on water quality and conservation.

2. List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Distribute Educational Materials – City Newsletters	Include Stormwater related articles in the City's Newsletters (currently Living Green or Life in the Prairie) a minimum of twice annually. The number of articles printed will be tracked.
Report-a-Problem Link	Provide a link for residents to communicate problems or issues identified in the community. A Report a Problem link is currently on the Managing our Water Resources Page. The location and availability of the link will be evaluated in 2014 and updated as needed. Communications received and the responses provided are tracked.
Living Green Web Pages	Post events and topics on the Living Green web page, including Living Green News and Living Green Events. The number of web site hits to the Living Green page will be tracked.
Environmental Event	Provide a minimum of one educational opportunity or workshop to residents on water quality related topics annually. The number who attend the event will be tracked.
Multi-Media Production	Develop a minimum of one multi-media production such as a kiosk or video to be used at the Environmental Learning Center, during city events, or on the web site. The number of productions and the locations where each item are used will be tracked.
Environmental Learning Center (ELC)	Continue to develop the ELC at the Water Treatment Plant for public outreach with local school districts. The number of classes or groups who attend the ELC for a tour or class will be tracked.
New Resident Packet	Provide informational packets to new residents who come in to homestead their property. The packets will contain information on topics such as water quality, water conservation or recycling. A copy of a recent City Newsletter will be included. The number of packets handed out annually will be tracked.
City Council Submittal	Provide information regarding the NPDES program annually. The information provided to the meeting will be tracked.
BMP categories to be implemented	Measurable goals and timeframes
Social Media	Use Facebook or other social media outlet to provide educational topics to residents on stormwater, recycling, and water conservation. A minimum of 4 postings will be completed annually. The number of postings and the number of Facebook subscribers at the end of each year will be tracked.

High Priority Topic Evaluation	Develop a list of high-priority topics to be emphasized during the permit term within 12 months of when permit coverage is extended. The number of topics selected and the plan to address these topics will be tracked. Depending on the topic selected, other tracking mechanisms may be utilized if needed.
E-Newsletter	Provide email notification to subscribers about updates to the City's environmental web site (currently Living Green) when needed to convey new information that is posted. The number of email notifications and number of subscribers at the end of the year will be tracked.
Educational Publications	Provide brochures on land alteration requirements and water quality rebates as needed. Update brochures previously written as needed. The number of land alteration permits and the number of water quality rebates granted will be tracked annually.
Source Water Protection Area Education Plan	Develop a plan to provide education to residents within the source water protection area regarding the potential for stormwater impacts within 12 months of when permit coverage is extended. The number of educational items developed and distributed will be tracked. Depending on the topic selected, other tracking mechanisms may be utilized if needed.

3. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Leslie Stovring, Environmental Coordinator

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

The City's stormwater pollution prevention program aims to address water quality concerns due to pollutants transported by stormwater runoff to our lakes, creeks and wetlands. The intent of the SWPPP is to meet the permit requirements as well as provide a user-friendly tool for day-to-day management of the City's stormwater system. Within the current SWPPP, the City outlines BMPs for each of the 6 Minimum Control Measures (MCMs) used to meet the Phase II NPDES permit requirements.

2. List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Annual Meeting	Hold one public meeting annually to distribute information regarding stormwater pollution prevention programs ongoing within the City and to allow the community to provide comments or suggestions for the continuing success of the SWPPP. Appropriate public notice will be provided. Public input will be considered annually. The date of the meeting, the date the notice is published, the number of people who attend and the comments received will be tracked.
Storm Drain Labeling Program	Alert residents via social media and website posts that the City has a volunteer program to label storm drains. The number of volunteers or volunteer groups will be tracked.
Wetland Health Evaluation Program (WHEP)	Provide opportunities for citizens to assess the health of selected, local wetlands as part of Hennepin County's wetland monitoring program when Hennepin County provides the program and volunteers are available. The number of volunteers and the number of wetlands monitored will be tracked.

Park Clean Up / Park Activities	Continue to provide a volunteer opportunity for local groups to participate in cleaning up waste materials from our park and trail system through the Parks Department. The number of groups who attend will be tracked.
Conservation Commission	Provide an avenue for residents to provide input to the City Council regarding topics such as stormwater and water quality. The number of volunteers on the Commission and the number of meetings held annually will be tracked.
BMP categories to be implemented	Measurable goals and timeframes
Citizen Assisted Monitoring Program (CAMP)	Provide an opportunity for residents to monitor lakes within the City as part of Metropolitan Council's Metropolitan Lake Monitoring Program. The number of volunteers and the number of lakes monitored will be tracked.
Adopt-a-Street Program	Update and promote the existing program to assist in keeping the streets free of debris and litter. The number of volunteer groups who sign up annually will be tracked.

3. Do you have a process for receiving and documenting citizen input? Yes No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Leslie Stovring, Environmental Coordinator

C. MCM 3: Illicit discharge detection and elimination

1. The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

Our City Code was updated to prohibit illicit discharges and connections. The current program includes providing training opportunities to Utilities, Streets, and Parks and Recreation field employees in a number of areas, including how to identify and take action in case of illicit discharges.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

- a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.) Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). Yes No
- b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. Yes No
- c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. Yes No
- d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. Yes No
- e. Procedures for the timely response to known, suspected, and reported illicit discharges. Yes No
- f. Procedures for investigating, locating, and eliminating the source of illicit discharges. Yes No
- g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. Yes No
- h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). Yes No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The city will update existing procedures to provide Emergency Response Procedures and written guidelines as required by the permit and will provide training opportunities to seasonal staff in addition to the existing educational opportunities provided within 12 months from when permit coverage is extended.

- List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Storm Sewer System Map	The storm sewer system base map was developed in 1997 and is updated as new information is identified. The map will continue to be updated as we complete our watershed inventories. The number of stormwater features will be tracked.
Regulatory Control Program	The City does not anticipate revising the existing city code; however we will review the code to ensure that it meets the City's needs to protect stormwater systems from illicit discharges while the stormwater management code section is being updated. The date that the city code update is completed, if needed, will be tracked.
City Clean Up Event	Continue to provide an annual event where residents can bring in items for disposal that are typically not picked up by local waste haulers. The amount of materials disposed of and an estimate of the number of vehicles who enter the event will be tracked.
Illicit Discharge Detection Plan	Evaluate and update the existing Illicit Discharge Detection and Elimination Program to meet new permit requirements within 12 months from when permit coverage is extended. The program will be integrated with the storm sewer inspection and maintenance program outlined in MCM 6. A written plan will be developed to identify, investigate, locate and eliminate illicit discharges. The dates and locations of IDDE inspections, reports of illicit discharges, the number of illicit discharges identified follow-up actions taken, outfalls or other areas where illicit discharges are identified, the number of illegal dumping sites reported to the MPCA, and the actions taken, including the number of follow-up tests (such as dye or smoke tests), will be tracked.

BMP categories to be implemented	Measurable goals and timeframes
Emergency Response Program (ERP)	Develop and implement ERPs to enforce and compel compliance with the Illicit Discharge Ordinance and set up a tracking mechanism in accordance with the permit requirements. The plan will be completed within 12 months from when permit coverage is extended. The date that the ERP is completed will be tracked.
IDDE Employee Education Program	Update and expand the employee education program regarding illegal dumping and illicit discharges and how to report suspected activities to meet the new permit requirements within 12 months from when permit coverage is extended. The number of employees trained will be tracked.
IDDE Public Education Program	Educate the public regarding illegal dumping and illicit discharges and how to report suspected activities using the measures outlined in MCMs 1 and 2. The City will evaluate the current illicit discharge education program and update the program as needed. The number of articles or other educational materials provided will be tracked.
Priority Area Identification	Evaluate the city and identify priority areas likely to have illicit discharges within 12 months from when permit coverage is extended. Based on the results of the evaluation, additional inspections will be scheduled for areas identified as having higher likelihood for illicit discharges. The number of sites identified and inspected will be tracked.

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? Yes No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Leslie Stovring, Environmental Coordinator

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

The City requires land alteration permits to be completed for any construction activities that impact one acre or more of land. Measures that were included as part of this permit process include a site plan review, inspection of construction sites, pre-construction meetings (for any site requiring a Land Alteration Permit), and a process to report problems. Applicants are required to submit plans for review and approval.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? Yes No
 - b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? Yes No
 - c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? Yes No
 - d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - 1) Does your program include procedures for identifying priority sites for inspection? Yes No
 - 2) Does your program identify a frequency at which you will conduct construction site inspections? Yes No
 - 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? Yes No
 - 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? Yes No
 - e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? Yes No
 - f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? Yes No
 - g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? Yes No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

Engineering Department staff will evaluate the permit conditions in relation to the new permit requirements, update the program and develop written procedures and checklists as needed within 12 months from when permit coverage is extended.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Regulatory Mechanism	Review and update the stormwater management provisions within City Code to meet the new stormwater permit requirements within 12 months from when permit coverage is extended. The date that the city code update is completed will be tracked.
Site Plan Review	Review and update site plan review procedures as needed to meet the new permit requirements within 12 months from when permit coverage is extended. The number of site plans reviewed will be tracked. The information tracked will include project name, location and total acreage disturbed.
Public Input	Review and update procedures for receipt and consideration of public input as needed to meet the new permit requirements within 12 months from when permit coverage is extended. The number of reports from the public will be tracked.
Site Inspection and Enforcement	Review and update procedures for conducting site inspections, including development of a checklist, to meet the new permit requirements within 12 months from when permit coverage is extended. A process for identifying priority sites for inspection will be developed. The number of site inspections conducted by erosion control inspectors will be tracked.
BMP categories to be implemented	Measurable goals and timeframes
Emergency Response Program	Develop and implement ERPs to enforce and compel compliance with the Stormwater Management and Land Alteration Ordinance requirements. For violations that are identified, the City will track persons responsible, the date and location of the observed violation, the corrective actions required, the date and type of enforcement used, referrals to other regulatory agencies (if any) and the date the violation was resolved. The plan will be completed within 12 months from when permit coverage is extended.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:
Mary Krause, Project Engineer

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

The City has developed an Ordinance and a stormwater management section in our Developer's Agreement template that include provisions to address post-construction site stormwater runoff. These address long-term maintenance and repair requirements for stormwater control structures that are not under drainage and utility easements.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? Yes No
3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):
- a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? Yes No
 - b. All supporting documentation associated with mitigation projects that you authorize? Yes No
 - c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? Yes No
 - d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? Yes No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

Engineering Department staff will evaluate the permit conditions in relation to the new permit requirements and update the program as needed within 12 months from when permit coverage is extended.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table

for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Regulatory Mechanism	Review and update the stormwater management provisions within City Code to meet the new stormwater permit requirements within 12 months from when permit coverage is extended. This will include incorporation of volume, total suspended solids and total phosphorus treatment requirements and limitations. The date that the city code update is completed will be tracked.
Maintenance Plan	Review and update the long-term maintenance provisions within City Code to meet the new stormwater permit requirements within 12 months from when permit coverage is extended. This will include requirements to protect and preserve structural stormwater BMPs and treatment effectiveness of stormwater BMPs. The date that the city code update is completed will be tracked.
Site Plan Review	Review and update site plan review procedures as needed to meet the new permit requirements within 12 months from when permit coverage is extended. The number of site plans reviewed, including items such as project name, location, owner and operator and legal mechanisms drafted (if needed), will be tracked as required.
Local Water Management Plan	Update the existing Local Water Management Plan to integrate the new stormwater permit requirements as needed. The date the plan is submitted to the City Council for approval and any public comments received will be tracked.
BMP categories to be implemented	Measurable goals and timeframes
Stormwater Mitigation Plan	Develop a plan to provide mitigation for Total Suspended Solids and Total Phosphorus treatment for circumstances where it cannot be cost-effectively managed onsite. The plan will be developed within 12 months from when permit coverage is extended. The number of projects where off-site mitigation is used will be tracked.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Leslie Stovring, Environmental Coordinator

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

Municipal staff from utility, street and parks departments are provided training opportunities annually for education on how to reduce pollutant runoff from municipal operations. Operations such as street sweeping; pesticide, herbicide and fertilizer usage; street salt storage and usage; and pond maintenance are some of the types of opportunities that have been provided. The City has an inspection program that monitors City owned operating areas and stockpiles.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? Yes No
3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

Engineering Department staff will evaluate the permit conditions in relation to the new permit requirements and update the program as needed within 12 months from when permit coverage is extended.

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Pond Inventory & Maintenance Assessment	The City has developed an inventory and maintenance plan to evaluate TSS and TP treatment effectiveness for constructed ponds and stormwater wetlands. No changes to the plan are anticipated at this time. The number of stormwater features inventoried and the proposed projects resulting from the assessment will be tracked.
Stockpile and Storage Area Inspection Program	Develop a written procedure to inspect stockpiles and storage and material handling areas quarterly to determine maintenance needs and verify proper functioning of BMPs on City-owned properties. Actions taken to remediate identified problems will be tracked.
Stormsewer Inspection Program	Inspect stormwater ponds, stormwater wetlands and infiltration BMPs that receive public drainage and stormwater outfalls at least once per permit cycle. The database will be updated as needed to clarify which structures should be in the inspection program. The number of ponds, wetlands, outfalls and BMPs inspected will be tracked.
Maintenance Plan	Based on inspection findings, the repair, replacement or maintenance plan will be updated if needed. The number and cost of capital improvement projects completed as a result of the inventory and maintenance assessment will be tracked.
Employee Training Program	Review and update the employee training program to ensure it meets the new permit requirements within 12 months from the date permit coverage is extended. The training will address the importance of protecting water quality and cover the requirements of the permit that are relevant to the job duties of the employee. Training opportunities, including the date and the names of employees in attendance at each opportunity, will be tracked.
Sweeping	Sweep entire city street system a minimum of once annually with a goal of sweeping each spring and fall. During intermittent times, the sweeping of streets and parking lots will focus on priority watersheds. The number of lane miles swept will be tracked.
BMP categories to be implemented	Measurable goals and timeframes
Facilities Inventory	Develop and maintain a Facilities Inventory of all facilities that are owned or operated by the City that contribute pollutants to stormwater discharges within 12 months from the date permit coverage is extended. The number of facilities inventoried and the date the inventory is completed will be tracked.
Facilities and Operations BMP Plan	Develop and implement a plan to prioritize activities and provide BMPs for inventoried facilities and municipal operations where needed to the maximum extent practicable after the Facilities Inventory is completed. The Plan will consider the source of pollutants and the sensitivity of receiving waters. BMPs will be developed to prevent or reduce pollutants from stormwater discharges. The BMP Plan will be completed within 12 months after the Facilities Inventory is complete. The date the plan is completed and the number of BMPs installed or constructed during the permit cycle will be tracked.
Source Water Protection Area (SWPA) Plan	Evaluate the need for development and implementation of BMPs for stormwater discharges that may affect SWPAs within 12 months from when permit coverage is extended. The plan will be completed in conjunction with the Facilities Inventory and will include a map of the source water protection elements as required. The number of BMPs implemented, if needed, will be tracked.
Structural Stormwater BMP Inspections	The City currently has a modified inspection schedule which we will continue to follow and update as needed. The number of structural stormwater BMPs inspected annually will be tracked.

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? Yes No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? Yes No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? Yes No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources? Yes No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? Yes No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? Yes No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? Yes No
- b. Covers the requirements of the permit relevant to the duties of the employee? Yes No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? Yes No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? Yes No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Engineering Department staff will evaluate the permit conditions in relation to the new permit requirements and update the program as needed within 12 months from when permit coverage is extended.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Leslie Stovring, Environmental Coordinator

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? Yes No
1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? Yes No
1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus

Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VIII. Add any Additional Comments to Describe Your Program